

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

UNITED STATES OF AMERICA,
ex rel. ALEX DOE, Relator

THE STATE OF TEXAS,
ex rel. ALEX DOE, Relator

THE STATE OF LOUISIANA,
ex rel. ALEX DOE, Relator,

Plaintiffs,

v.

PLANNED PARENTHOOD FEDERATION
OF AMERICA, INC.,
PLANNED PARENTHOOD GULF COAST,
INC.,
PLANNED PARENTHOOD OF GREATER
TEXAS, INC.,
PLANNED PARENTHOOD SOUTH TEXAS,
INC.,
PLANNED PARENTHOOD CAMERON
COUNTY, INC.,
PLANNED PARENTHOOD SAN ANTONIO,
INC.,

Defendants.

No. 2:21-cv-022-Z

Date: December 21, 2022

**APPENDIX D IN SUPPORT OF PLANNED PARENTHOOD FEDERATION OF
AMERICA, INC.'S MEMORANDUM OF LAW IN SUPPORT OF ITS OPPOSITION
TO TEXAS'S MOTION TO COMPEL**

APPENDIX D

Priv Log #	Date	Author	Recipient(s)	Privilege Type	Privilege Description
PRIV-002291	5/7/2018	Hart, Kelly	Gottlieb, Kathryn*; White, Kasia; Limon-Mercado, Dyana; Gutierrez, Yvonne; Wiens-Talbert, Angie; Posada, Mara; Flaxman, Carrie*; Flood, Kristin*; Watson, Beth; Nguyen, Tram	Attorney Client Privilege	Confidential email providing legal advice from in-house counsel Kathryn Gottlieb, Esq., Carrie Flaxman, Esq., and Kristin Flood, Esq., regarding state regulatory compliance strategy.
PRIV-002315	4/21/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Barraza, Polin*; McKinney, Sheila; Posada; Limon- Mercado, Dyana; Wiens-Talbert, Angie; Wheat, Sarah; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*; Wu, Angela	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002324	4/7/2020	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Hons, Jeffrey; Posada, Mara; Barraza, Polin*; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding media relations.
PRIV-002325	4/7/2020	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Hons, Jeffrey; Posada, Mara; Barraza, Polin*; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002326	4/3/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Posada, Mara; Barraza, Polin*; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002327	3/31/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002328	3/31/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002329	3/31/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of

PRIV-002330	3/30/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melanie; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq., regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002331	3/30/2020	McKinney, Sheila	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melanie; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002332	3/30/2020	Wheat, Sarah	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melanie; Hons, Jeffrey; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002333	3/29/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melanie; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email discussing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002334	3/26/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melanie; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Clapman, Alice*; Muniz, Richard*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email discussing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002335	3/26/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melanie; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Clapman, Alice*; Muniz, Richard*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002336	3/26/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melanie; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Clapman, Alice*; Muniz, Richard*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002337	3/26/2020	Gottlieb, Kathryn*	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melanie; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon- Mercado, Dyana; Wiens-Talbert, Angie; Clapman, Alice*; Muniz, Richard*; Murray, Julie*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002338	3/26/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melanie; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens- Talbert, Angie; Gottlieb, Kathryn*; Clapman, Alice*; Muniz, Richard*; Murray, Julie*	Attorney Client Privilege; Work Product	Confidential email providing legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.

PRIV-002340	4/21/2020	Gottlieb, Kathryn*	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Barraza, Polin*; McKinney, Sheila; Posada, Mara; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*; Wu, Angela	Attorney Client Privilege; Work Product	Confidential email providing legal advice from Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002369	3/26/2020	Barraza, Polin	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Clapman, Alice*; Muniz, Richard*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email requesting and providing legal advice from in-house counsel Julie Murray, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002373	4/20/2020	Sandman, Jennifer*	Linton, Melaney; Lambrecht, Ken; Hons, Jeffrey; Posada, Mara; Barraza, Polin*; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Wheat, Sarah; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*; Wu, Angela	Attorney Client Privilege; Work Product	Confidential email providing legal advice from Julie Murray, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002374	4/20/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Barraza, Polin*; McKinney, Sheila; Posada, Mara; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Wheat, Sarah; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*; Wu, Angela	Attorney Client Privilege; Work Product	Confidential draft document attached to email and containing legal advice from in-house counsel Julie Murray, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002375	4/17/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Barraza, Polin*; McKinney, Sheila; Posada, Mara; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Wheat, Sarah; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*; Clarke, Christine*; Wu, Angela	Attorney Client Privilege; Work Product	Confidential email providing legal advice from Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002392	3/31/2020	Hons, Jeffrey	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Limon-Mercado, Dyana; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*; Clarke, Christine	Attorney Client Privilege; Work Product	Confidential email requesting and providing legal advice from in-house counsel Julie Murray, Esq., Hannah Swanson, Esq., Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.

PRIV-002394	3/30/2020	Jeffrey Hons	Sandman, Jennifer*; Lambrecht, Ken; Linton, Melaney; Wheat, Sarah; Polin Barraza; Mara Posada; McKinney, Sheila; Dyana Limon-Mercado; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julia*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email requesting legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002395	3/30/2020	Linton, Melaney	Sandman, Jennifer*; Lambrecht, Ken; Hons, Jeffrey; Wheat, Sarah; Barraza, Polin*; Posada, Mara; McKinney, Sheila; Dyana Limon-Mercado; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email attached to email and sent for the purpose of obtaining legal advice from in-house counsel Jennifer Sandman, Esq., Bethany Sousa, Esq., and Kristin Flood, Esq. regarding litigation strategy and prepared in anticipation of litigation.
PRIV-002396	3/30/2020	Sandman, Jennifer*	Lambrecht, Ken; Linton, Melaney; Hons, Jeffrey; Wheat, Sarah; Polin Barraza; Posada, Mara; McKinney, Sheila; Dyana Limon-Mercado; Wiens-Talbert, Angie; Gottlieb, Kathryn*; Murray, Julie*; Swanson, Hannah*	Attorney Client Privilege; Work Product	Confidential email requesting legal advice from in-house counsel Jennifer Sandman, Esq. regarding litigation strategy and prepared in anticipation of litigation.